

Independent Oil & Gas Association

of New York

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Dockets Unit, Room 8417
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street S.W.
Washington, DC 20590

Re: 49 CFR Part 192
(**Docket** No. PS-122, Notice 1)
Gas Gathering Line Definition

Gentlemen:

In response to your proposed **gas** gathering line definition, the Independent Oil & Gas Association of New York would like to make the following comments:

1) IOGA of New York disagrees with your statement that "Most gas gathering lines have processing plants where the heavier hydrocarbons are removed...". A very small percentage of gathering lines in New York are equipped with processing plants. In New York, the function of stripping natural **gas liquids** from gas streams is almost always done by a Local Distribution Company (LDC) or an Interstate Pipeline on their regulated pipeline systems.

2) The reclassification of gathering lines to transmission lines would result in an unnecessary burden on companies due to the extensive reporting requirements associated with transmission lines. Because the vast majority of gathering systems are found in rural areas, we feel there is minimal risk of having these facilities operated unregulated by the U.S. Department of Transportation.



3) Under the proposed definition, we fail to see why a gathering system would become a transmission system just because there is a transfer of custody of the gas. In many cases it is common for the owner of the gathering system to accept transfer of custody of gas at an individual well meter for another party. This practice eliminates duplication of gathering facilities which minimizes not only risk to the general public but damage to the environment. Triggering a reclassification from a gathering to a transmission pipeline for this simple transaction is not warranted. No pipeline operations procedures or increased safety concerns arise from this simple transaction.

IOGA of New York is recommending the following definition:

Gas gathering line shall mean any pipeline or part of a connected series of pipelines used to transport gas from a well or group of wells to the point where custody of the gas is transferred to an end user, **gas** storage facility, gas processor, local distribution company or interstate pipeline.

We feel this proposed definition is adequate at distinguishing a gathering line from a transmission or distribution line.

Thank you for the opportunity to comment.

Sincerely,

Tony Kovacevich
Chairman, Producer Committee